

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

**CONSOLIDATED CASES:**

No. 1:23-cv-08292-SHS

No. 1:23-cv-10211-SHS

No. 1:24-cv-00084-SHS

**MOTION FOR ADMISSION  
*PRO HAC VICE***

NICHOLAS A. BASBANES and NICHOLAS  
NGAGOYEANS (professionally known as Nicholas  
Gage), individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI GP, LLC, OPENAI HOLDINGS, LLC,  
OAI CORPORATION, LLC, OPENAI GLOBAL,  
LLC, OPENAI, LLC, and OPENAI OPCO LLC,

Defendants.

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Carolyn Homer hereby moves this Court for an Order for admission to practice pro hac vice to appear as counsel for Defendants Defendants OpenAI Inc., OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-captioned action. and in the above-captioned action.

I am a member in good standing of the Bar of Washington D.C. and the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: October 24, 2024

RESPECTFULLY SUBMITTED,

/s/ Carolyn Homer

Carolyn Homer

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*Attorneys for Defendants*